

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

BAY MANAGEMENT GROUP, LLC, *

Plaintiff,

*

v.

CIVIL RIGHTS DIVISION, OFFICE *
OF THE ATTORNEY GENERAL OF
MARYLAND, *et al.*,

*

Defendants.

*

* * * * *

**MOTION TO WITHDRAW DEFENDANTS' MOTION TO DISMISS WITHOUT
PREJUDICE AND TO EXTEND THE DEADLINE TO RESPOND TO THE
COMPLAINT**

Defendants, Civil Rights Division, Office of the Attorney General of Maryland and Anthony G. Brown, pursuant to a Telephonic Conference held by the Court on October 8, 2025, by undersigned counsel hereby move to (1) withdraw their Motion to Dismiss **without prejudice**; and (2) extend the current deadlines for Defendants' response to Plaintiff's Complaint.

The Parties have reached a partial resolution of the claims asserted in this litigation and are cautiously optimistic that an additional ninety (90) day extension of the deadline for Defendants' response to Plaintiff's Complaint will lead to a global resolution of all disputes between the Parties. The partial resolution requires the Parties to complete certain

tasks in next ninety (90) days, corresponding with the period of extension sought in this Motion. Defendants therefore respectfully request that the Court allow Defendants to withdraw their Motion to Dismiss without prejudice and permit an additional extension of the deadlines set forth in the current Briefing Schedule, as follows:

- Defendants' deadline to file a response to Plaintiff's Complaint shall be extended to January 19, 2026.

Good cause warrants granting the requested extension as no party will be prejudiced by the extensions and no scheduling order has currently been entered in the case that would be affected by the requested extensions. Further, it is in the interest of judicial economy to allow the Parties an additional amount of time to finalize a potential resolution of all disputes between them. Thus, Defendants respectfully request that the Court grant this Motion.

Date: October 20, 2025

Respectfully submitted,

ANTHONY G. BROWN
Attorney General of Maryland

/s/ James D. Handley
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*Attorneys for Defendants, Civil Rights
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Anthony G. Brown*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of October, 2025, the foregoing Motion, along with the proposed Order accompanying the Motion, was filed with the Court's CM/ECF system and served on all counsel of record.

Date: October 20, 2025

/s/ James D. Handley
James D. Handley